

**PAUL**  
**HASTINGS**

1(212) 318-6046  
kennethgage@paulhastings.com

January 18, 2023

**VIA ECF**

Hon. Lorna G. Schofield  
U.S. District Court, S.D.N.Y.

Re: *Ulku Rowe v. Google LLC*, Case No. 1:19-cv-08655-LGS

Dear Judge Schofield:

We represent Google LLC ("Google") in this matter. Pursuant to Rule I(B)(2) of Your Honor's Individual Rules and Procedures, the parties jointly request an extension of the deadlines for Google to file a motion related to Plaintiff's testifying expert, and for Plaintiff to oppose that motion. The current deadlines are January 20 and January 27, 2023, respectively.

Google deposed Plaintiff's expert, Nora Ostrofe, on January 11, 2023. During the deposition, Google learned that Plaintiff's expert expects to serve a supplemental report in the coming days. Google requests that the deadline to file a motion related to Plaintiff's testifying expert be extended to 14 days after the supplemental report's service. Plaintiff will have 7 days to oppose Google's motion.

This is the parties' second request for an extension of this schedule. The previous request was granted. (ECF No. 287.) All parties consent to this request. We thank the Court for its consideration.

Respectfully submitted,



Kenneth W. Gage  
PAUL HASTINGS LLP